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October 21, 2021

VIA ECF

Hon. Valerie E. Caproni
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/22/2021

Re: Orellana *et al.* v. Real Innovative Construction,
LLC *et al.*, No. 18-cv-8396 (VEC) (RWL)

Dear Judge Caproni:

This office represents plaintiffs in the above-referenced matter. I write to request a two-week extension to submit plaintiffs' application for default judgment against defendant Carlos Morales on both liability and damages.

Pursuant to Your Honor's September 7, 2021 Order, plaintiffs are to submit their application for default judgment against defendant Morales no later than October 25, 2021. While counsel has prepared the documents needed for the application and has received executed declarations from the vast majority of the 34 plaintiffs, counsel is still waiting to receive executed declarations from eight plaintiffs.

This is plaintiffs' second request for an extension of time to file their default judgment application against defendant Morales. Plaintiffs' requested extension will not affect any other pending deadlines.

Accordingly, plaintiffs respectfully request a two-week extension, *i.e.*, until November 8, 2021, to file their motion for default judgment against defendant Morales on both liability and damages. Thank you for your consideration in this matter.

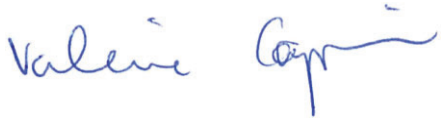
Respectfully submitted,



Thomas J. Lamadrid

Application GRANTED. Plaintiffs must move for default judgment against Defendant Carlos Morales by **November 8, 2021**.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

10/22/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE